

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE LUMIFY

Civil Action No. 21-16766 (RK) (RLS)
(CONSOLIDATED)

JOINT STIPULATION OF EXPERT QUALIFICATIONS AND RECORD ADMISSIONS

Pursuant to Rule 702 of the Federal Rules of Evidence, Plaintiffs Bausch & Lomb, Inc., Bausch & Lomb Ireland Limited, and Eye Therapies, LLC's (collectively, "Plaintiffs") and Defendants Slayback Pharma LLC, Slayback Pharma India LLP, Dr. Reddy's Laboratories S.A., and Dr. Reddy's Laboratories, Inc.'s ("Defendants") (collectively, "the Parties"), by and through their respective undersigned counsel, and subject to the approval of the Court, stipulate and agree as follows:

1. The following expert qualifications are accepted by the Parties:

Plaintiffs' Experts	Areas of Expertise
Robert J. Noecker, M.D., M.B.A.	Ophthalmology and pharmacological management of ophthalmic conditions (Science Day Tr. (Jan. 23, 2024) at 66:14-19; Noecker Opening Decl. Appendix A)
William Daniel Stamer, Ph.D.	Ocular pharmacology and physiology (Science Day Tr. (Jan. 23, 2024) at 110:14-18; Stamer Opening Decl. Appendix A)
Stephen Davies, D. Phil.	Chemistry (including medicinal chemistry and drug development) (Science Day Tr. (Jan. 23, 2024) at 127:14-17; Davies Decl. Appendix A)

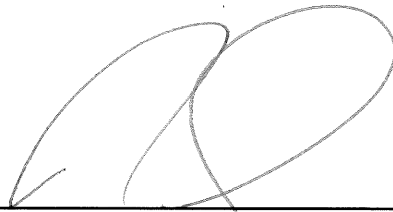
Robert O. Williams III, Ph.D.	Pharmaceutical sciences, drug development, and pharmaceutical formulation (Science Day Tr. (Jan. 23, 2024) at 140:10-14; Williams Decl. Appendix A)
Eric Donnenfeld, M.D.	Ophthalmology, ocular surgery, and clinical trials, with clinical expertise in treating patients (Hearing Tr. (Jan. 24, 2024) at 52:24-53:4; Donnenfeld Decl. Appendix A)
Daniel Gil, Ph.D.	Pharmacology (including alpha-adrenergic pharmacology) (Hearing Tr. (Jan. 24, 2024) at 101:1-5; Gil Decl. Appendix A)
John Jarosz	Economics of intellectual property protection, including evaluation of commercial success and injunctive relief (Hearing Tr. (Jan. 25, 2024) at 237:15-20; Jarosz Opening Decl. Tab 1)
David Van Howe	Retail operations, merchandising, and product launch strategies, including for over-the-counter products and beauty products (Hearing Tr. (Jan. 31, 2024) at 851:20-25; Van Howe Decl. Appendix A)

Defendants' Experts	Areas of Expertise
Lisa Cameron, Ph.D.	Economics of intellectual property, including intellectual property protection and evaluations of injunctive relief and patent infringement damages (Hearing Tr. (Jan. 30, 2024) at 562:3–566:15; Cameron Decl., ¶¶ 1–4; <i>Id.</i> , Ex. A)
Reza Dana, MD, MSC, MPH	Ophthalmology, ocular inflammation, ocular drug development, and clinical trial design (Science Day Tr. (Jan. 23, 2024) at 171:20–174:19; Dana Decl., ¶¶ 3–7; <i>Id.</i> , Ex. A)
John C. Galanis, M.D.	Ophthalmology, cataract and LASIK surgery, the treatment of glaucoma, and the medical and surgical management of eye disease

	(Hearing Tr. (Jan. 31, 2024) at 704:1–706:1; Galanis Decl., ¶¶ 3–8; <i>Id.</i> , Ex. A)
Sandra Kinsey M.B.A., R.Ph.	Retail operations, product sourcing and contracting, inventory management, and supply chain management (Hearing Tr. (Jan. 30, 2024) at 503:17–508:14; Kinsey Decl., ¶¶ 4–11; <i>Id.</i> , Ex. A)
Paul. A. Laskar, Ph.D	Ophthalmic formulations (Science Day Tr. (Jan. 23, 2024) at 198:22–201:4; Lasker Decl., ¶¶ 3–9; <i>Id.</i> , Ex. A)
Radojka Savic, Ph.D.	Biostatistics, pharmacometrics, clinical trial design, and pharmacology, including quantitative and clinical pharmacology (Savic Decl., ¶¶ 6–13; <i>Id.</i> , Ex. A)

2. All declarations and exhibits relating to this motion, as well as live testimony and associated exhibits from both Science Day and the hearing itself are to be formally moved into the record. All witness slides from both parties are to be moved into the record as demonstrative exhibits.

3. Except as expressly addressed herein, this stipulation does not affect the Parties' right to object to the admissibility of any other testimony, evidence, document, or thing under any ground(s) permitted by law. Further, the Parties' stipulation with respect to the admissibility of the declarations does not constitute a waiver of any objections or disputes the Parties have with respect to the arguments advanced within those declarations.



Honorable Robert Kirsch, U.S.D.J.

STIPULATED AND AGREED TO this 2nd day of February 2024 by:

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